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Attorneys for Defendants FLOORINDO, INC. dba TROPICAL FLOORING,
MAXIMUS FLOORING, FANTASTIC FLOORING, POPULAR FLOORING,
KC INDUSTRIES CO., CHRISTINA & SON, INC., GUNTAR SALIM, TEGUH
SALIM, TOUPAN SALIM, BOBBY LIN aka BOBBY LIM, YUN FANG
ZHANG aka CHRISTINA ZHANG

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNILIN BEHEER B.V., <i>et al.</i>) Case No.: 2:14-cv-02209-BRO(SSx)
)
Plaintiffs,) DECLARATION OF VIVIAN Z.
v.) WANG IN SUPPORT OF
) DEFENDANTS' MOTION TO DISMISS
TROPICAL FLOORING, <i>et al.</i>)
) Date: June 16, 2014
Defendants.) Time: 1:30 P.M.
) Place: Courtroom 14
) Judge: Hon. Beverly Reid O'Connell
)

1 I, Vivian Z. Wang, hereby declare:

2 1. I am an attorney and a member of the Bar of the State of California. I
3 am an attorney at Kleinberg & Lerner LLP, attorney of record for Floorindo, Inc.,
4 Tropical Flooring, Maximus Flooring, Fantastic Flooring, Popular Flooring, KC
5 Industries Co., Christina & Son, Inc., and the individuals Teguh Salim, Toupan
6 Salim, Bobby Lin, aka Bobby Lim, aka Guntar Salim, Yun Fang Zhang aka
7 Christina Zhang (collectively, "Floorindo"). I have personal knowledge of the
8 facts set forth in this declaration, and if called upon as a witness I could and would
9 competently testify thereto.

10 2. Pursuant to Local Rule 7-3, the Parties duly conducted a meet and
11 confer session on May 9,

12 3. A true and correct copy of the May 5, 2014 letter from Michael Hurey
13 to Unilin counsel Timothy Fox is attached as Exhibit A.

14 4. A true and correct copy of the May 14, 2014 letter from Michael
15 Hurey to Unilin counsel James Lee is attached as Exhibit B.

16 I declare under penalty of perjury that all of the foregoing is true and correct.
17 Executed on May 16, 2014 at Los Angeles, California.

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19 /s/ Vivian Z. Wang

20 Vivian Z. Wang
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CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury that I am over the age of 18 years and not a party to this action; and that I served the individuals on the below-service list the following document(s):

**DECLARATION OF VIVIAN Z. WANG IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS WITH EXHIBITS A and B**

Filed May 16, 2014 on the ECF system, served pursuant to General Order No. 550 and/or via email, with:

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Attorneys for Defendants
Andrew Oei, Nulook Floor,Inc.,
and Siena Décor, Inc.

Date: May 16, 2014

/s/Vivian Z. Wang
Vivian Z. Wang

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